

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**HEATHER TAYLOR (AKA HEATHER SHANK)**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO.: 1:15-cv-290-LG-RHW**

**HARRISON COUNTY, MISSISSIPPI,**

**By and through its Board of Supervisors,**

**HARRISON COUNTY SHERIFF DEPARTMENT**

**SHERIFF MELVIN BRISOLARA, in his official capacity, and**

**JOHN DOES 1-25, in their official and individual capacity**

**DEFENDANTS**

**MOTION TO FILE UNDER SEAL DEFENDANTS' REPLY IN SUPPORT  
OF THEIR MOTION FOR SUMMARY JUDGMENT AND EXHIBITS THERETO**

COME NOW, Defendants, former Sheriff Melvin Brisolara, in his official capacity and Harrison County, Mississippi, by and through their counsel of record, and file this their Motion to file Under Seal Documents, Defendants' Reply in Support of their Motion for Summary Judgment and Exhibits thereto with regard to the above referenced matter, and would show unto this Court the following, to wit:

1. On July 14, 2016, this Court entered a Protective Order [DN 33] which was agreed upon by all parties thereto, which dictates that the parties may not file any confidential information in the public record in the above and foregoing litigation.

2. On January 31, 2017, Defendants herein filed under seal their Motion for Summary Judgment, Memorandum in Support of Motion and all un-redacted exhibits thereto through conventional means in compliance with the Protective Order.

3. Defendants herein, again, respectfully request that the Court issue an Order

permitting the filing under seal of their Reply in Support of Motion for Summary Judgment, and any un-redacted documents which are exhibits thereto.

4. Specifically, the documents to be filed under seal are identified as follows:

- Reply in Support of Motion for Summary Judgment;
- Any and all un-redacted Exhibits thereto.

Based on the foregoing, Defendants, former Sheriff Melvin Brisolara and Harrison County, Mississippi, hereby move this Honorable Court to grant their Motion to File Under Seal Defendants' Reply in Support of their Motion for Summary Judgment and any exhibits thereto. Defendants pray for any and all other such relief as this Honorable Court deems appropriate.

RESPECTFULLY SUBMITTED, this the 23<sup>rd</sup> of February, 2017.

**MELVIN BRISOLARA, IN HIS OFFICIAL CAPACITY  
AS FORMER SHERIFF OF HARRISON COUNTY,  
MISSISSIPPI, Defendant**

**By: DUKES, DUKES, KEATING & FANCA, P.A.**

By: /s/ Haley N. Broom  
HALEY N. BROOM

**HARRISON COUNTY, MISSISSIPPI, by and through its  
Board of Supervisors, Defendant**

**By: BOYCE HOLLEMAN & ASSOCIATES**

By: /s/ Patrick T. Guild  
PATRICK T. GUILD

HALEY N. BROOM, MSB #101838  
DRURY S. HOLLAND, MSB # 104371  
**DUKES, DUKES, KEATING & FANCA, P.A.**  
2909 - 13th Street, Sixth Floor  
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Gulfport, Mississippi 39502  
Telephone: (228) 868-1111  
Facsimile: (228) 863-2886

**CERTIFICATE OF SERVICE**

I, Haley Broom, do hereby certify that I have this day have filed this Notice electronically and have delivered, via United States Mail, postage fully pre-paid, a true and correct copy of the above and foregoing document to the following:

Joel L. Blackledge  
Blackledge Law Firm  
P.O. Box 8155  
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[joel@blackledgelawfirm.com](mailto:joel@blackledgelawfirm.com)

Andrew C. Burrell  
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1720 23<sup>rd</sup> Avenue  
Gulfport, MS 39501  
[tim@boyceholleman.com](mailto:tim@boyceholleman.com)

This, the 23<sup>rd</sup> day of February, 2017.

By: /s/ Haley Broom  
HALEY N. BROOM

HALEY N. BROOM, MSB #101838  
DRURY S. HOLLAND, MSB # 104371  
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